

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

BIENVENIDO FRANCO, Individually and on	)	
Behalf of All Others Similarly Situated,	)	
	)	
Plaintiffs,	)	Civ. No.: 07 CV 3956
v.	)	(JS/AKT)
	)	
IDEAL MORTGAGE BANKERS, LTD. d/b/a	)	
LEND AMERICA, INC., MICHAEL ASHLEY,	)	
TIMOTHY MAYETTE, HELENE DECILLIS,	)	
MICHAEL PRIMEAU,	)	
	)	
Defendants.	)	

**PLAINTIFFS' MOTION IN LIMINE NO. 4**

Plaintiffs respectfully move this Honorable Court to exclude the following evidence:

Any evidence regarding any Plaintiff's employment with any employers other than Defendants. Discussion of the specific circumstances of any Plaintiff's employment with any other employer is not relevant to the issues in this case. The introduction of such evidence would consume considerable court time and would have little, any, probative value under Fed.R.Evid. 401. Additionally, the introduction of such evidence runs the risk of creating undue prejudice in violation of Fed.R.Evid. 403.

Dated: July 15, 2013

Respectfully Submitted,

/s/ James B. Zouras

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**COUNSEL FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **PLAINTIFFS'**  
**MOTION IN LIMINE NO. 4** was served upon the following parties via this Court's  
ECF filing system, this 15<sup>th</sup> day of July, 2013:

Robert H. Weiss  
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And, electronically mailed the above mentioned on this 15<sup>th</sup> day of July, 2013 to  
the following address:

Helene DeCillis  
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*/s/ James B. Zouras*  
James B. Zouras